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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING EXPANDED SITE
INVESTIGATION REPORT NS MAYPORT FL
10/31/1988
U S EPA REGION IV



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

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OCT 31 1988

REF: 4WD-SISB/ND

Mr. G. C. Bradley
Department of the Navy
Naval Facilities Engineering Command
2155 Eagle Drive
P. O. Box 10068
Charleston, SC 29411-0068

Re: Expanded Site Investigation
Mayport Naval Station

Dear Mr. Bradley:

The Federal Facilities Unit has reviewed the Site Investigation (SI) Report submitted by the Mayport Naval Station, Mayport, Florida, and has the following comments:

Page 19, Section 2.4.1 - Has a domestic well survey been completed? Although analyticals may show groundwater to be unpotable, it is often used anyway. If it is not used for drinking, then it still might be used for watering, bathing, swimming pools, etc. A well survey should be completed. If wells do exist, include the identification of the closest "in use" well to the site.

Page 30, Section 3.2.3 - The SI report shows contaminants present in ditch water and sediments. From the report these ditches drain into Sherman Creek, which in turn appears to flow through a populated area. It is recommended that samples be taken along this creek to insure the safety of nearby residents.

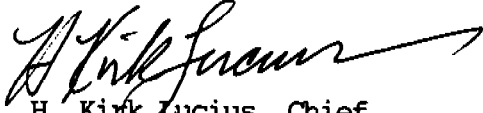
Appendix B, EPA Superfund program has not reviewed or approved sample collecting methodology or laboratory analytical methodology. EPA can accept the data submitted in Appendix B, but cannot approve it. Field Sampling and Analysis Plans and QA/QC Plans should be submitted to EPA for review prior to field work. If these plans have been reviewed and approved as part of a RCRA Facility Investigation, then such an approval will suffice for the Superfund program as well.

The following two additional items must be submitted by the facility for ranking under the HRS2 system:

1. A RCRA Summary
2. An HRS2 information package

Please find information on these two submittals enclosed. EPA must receive this information prior to April 18, 1989. If you require further assistance, please contact Nancy Dean at FTS 257-5059.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "H. Kirk Lucius", with a long, sweeping horizontal stroke extending to the right.

H. Kirk Lucius, Chief
Site Investigation and Support Branch
Waste Management Division

Enclosure

INSTRUCTIONS FOR PREPARING RCRA SUMMARY

RCRA Summary: The RCRA Summary should briefly describe operations and/or past operations at the facility, its interim status or lack of interim status, and any changes in interim status. The RCRA summary should discuss the situation at the facility in light of the three criteria which allow EPA to list RCRA sites. Briefly, those criteria include 1) bankrupt sites, 2) loss of authorization to operate/probable unwillingness to carry out corrective action, and 3) case by case determinations of unwillingness. The criteria are more fully explained in the June 10, 1986 Federal Register, pp. 21057 and 21058. Include all pertinent details in the RCRA Summary, as it will be used to evaluate the site's eligibility for HRS rankings and the NPL, or to develop a case for documenting "unwillingness" to list a RCRA site.

Note: In addition to the three criteria listed above, sites not subject to RCRA Subtitle C Corrective Action Requirements are eligible for the NPL. Those sites are listed below:

- ° Generators with 90-day storage
- ° Transporters
- ° Protective filers
- ° Facilities whose waste is not a RCRA-regulated waste
- ° Facilities that ceased treating, storing, or disposing of hazardous wastes prior to November 19, 1980.

The following paragraphs describe points on interim status, land-disposal units, and facility operation that may be helpful to you in preparing your RCRA summary.

Interim Status

As stated before, the RCRA Summary should discuss the facility's interim status, or lack of it. Be sure to reference and include the original RCRA Part A Permit and any documentation that indicates that the interim status has changed. Unless the facility never notified and does not have a Part A, the RCRA Summary is not complete without a copy of the original Part A.

Non-contiguous Land Disposal Units

In the case of land disposal, be sure to check and see if the land disposal unit is off-site or noncontiguous to the RCRA facility. In some cases, non-contiguous land disposal units are not covered by the facility's interim status.

TSD Activities

Describe the facility's treating, storing, and/or disposing practices. If the facility was a treater, storer, and disposer (TSD) before November 19, 1980, be sure to describe the action taken to change those practices prior to RCRA authority. For instance, the facility may have begun discharging wastes to the publicly-operated waste water treatment plant prior to November 19, 1980. Before then, wastes were disposed of in an on-site pond or discharged into a ditch. It may be helpful to review state industrial wastewater files in addition to state hazardous waste files.

RCRA Summary Preparation

In an effort to determine whether or not a RCRA facility may be NPL eligible, EPA Headquarters has requested that a summary of the facility's relationship to RCRA be submitted along with the HRS documentation package. The summary should briefly describe the facility's operations and disposal methods, contrasting past and present operations. The summary should provide exact dates, when possible, that correspond with any changes in its operational or disposal methods. Key components that should be addressed in the summary include the following:

- o Notification of Hazardous Waste Activity (Interim Status),
- o Part A Application,
- o Part B Application,
- o Bankruptcy,
- o Loss of authorization to operate/probable unwillingness to carry out corrective action,
- o Case-by-case determination of unwillingness,
- o Generator status (less than 90-day storage),
- o Transporter status,
- o Protective filers,
- o Handler of non-RCRA hazardous waste,
- o Cease treatment/storage/disposal of hazardous waste prior to November 19, 1980.

The RCRA summary is limited to one page in length and should include a bibliography with excerpts of the references used, such as a Part A application, correspondence concerning protective filers, or Notification of Hazardous Waste Activity forms.

To aid in the collection of information and subsequent summary preparation, several excerpts of documents have been included as an Appendix to this chapter. These excerpts include the following:

- o Releases from RCRA Sites, June 10, 1986 Federal Register; Vol. 51, No. 111; pp. 21054-62,
- o Code of Federal Regulations (40 CFR Parts 260 and 261) defining RCRA hazardous waste and denoting specific and non-specific sources of RCRA hazardous waste,
- o Notification of Hazardous Waste Activity, EPA Form 8700-12 (2-80),
- o Part A Application, EPA Form 3510-1 (5-80),
- o Preliminary RCRA/NPL Policy Questionnaire,

In addition, the EPA Office of Solid Waste has published a RCRA Orientation Manual which is extremely helpful in understanding the intent and scope of RCRA. This document can be purchased through the Superintendent of Documents, U. S. Government Printing Office, Washington, D.C. 20402, (202) 783-3238 at a cost of \$7.00 per copy. Questions arising that concern Regional or Headquarters policy on the listing of RCRA sites or general guidance for the preparation of RCRA summaries should be directed to Camilla B. Warren, EPA Region IV, ICU, (404) 347-2234. Questions concerning the RCRA status of sites should be directed to one of the Residuals Management Branch personnel:

- o Beverly Spagg: AL/MS (404) 347-3067
- o Wayne Garfinkel: GA/FL (404) 347-3433
- o Betty Willis: KY/TN (404) 347-3433
- o John Dickinson: NC/SC (404) 347-3067

An additional source of information, concerning RCRA and all regulations derived from the Act is the RCRA Hotline, 1-800-424-9346.

INTEROFFICE MEMORANDUM

| And/Or To Other Than The Addressee | | | |
|------------------------------------|--------------------------|----------------|--------------------------|
| To: | _____ | Locn: | _____ |
| To: | _____ | Locn: | _____ |
| To: | _____ | Locn: | _____ |
| From: | _____ | Date: | _____ |
| Reply Optional | <input type="checkbox"/> | Reply Required | <input type="checkbox"/> |
| Date Due: | _____ | Date Due: | _____ |
| | | Info. Only | <input type="checkbox"/> |

NORTHEAST DISTRICT - JACKSONVILLE

TO: Eric Nuzie
Bureau of Waste Clean-up, Tallahassee

THROUGH: Jay Carver *JC*
Technical Services, Jacksonville

FROM: Stephen Knüttel *SK*
Technical Services, Jacksonville

DATE: November 2, 1988

SUBJECT: U.S. Naval Air Station Mayport: Naval Installation
Restoration Program (NIRP) Expanded Site
Investigation Final Report, submitted August 12,
1988.

I have reviewed the subject document and have comments for your consideration. At most sites, contamination has been indicated but only a risk assessment has been proposed. I think that it is somewhat premature to propose a risk assessment at these sites. Further delineation of the contamination, a feasibility study and remedial actions appear to be more appropriate at this time. My specific comments are as follows:

Site 1

Lead is reported above the drinking water standard and above the USEPA ambient water quality criteria for chronic exposure in marine environments in well MPT-1-B. It is not clear how an environmental risk assessment could be acceptable when lead levels are above standards that are based on risk levels. Some remedial action is required.

Site 2

The proposed work appears adequate.

Site 3

It is stated in the conclusions that groundwater flow at Site 4 is anticipated to be radial. Therefore, additional monitoring wells should be installed at the northwest and southeast corners of the site to verify the direction of groundwater flow and to detect possible releases. Lead is also reported above the drinking water standard in well MPT-2-B.

Site 5

Remedial action is required due to the elevated chromium concentrations at Site 5. Additional monitoring of the existing wells should be conducted to confirm contamination.

Site 6

Site 6 is the largest of the landfills at N.A.S. Mayport (24 acres) and has only 3 monitoring wells to monitor releases. Two of these wells are located in the same area as a cluster well on the north corner of the landfill and the other is approximately 400 ft. east of the landfill. This system appears inadequate to monitor all possible releases from the landfill. Additionally the highest area of the Naval Station is located to the northeast of the site and a swampy area is located to the south. Therefore, it seems likely that some component of groundwater flow should be moving to the south. A minimum of 4-5 additional monitoring wells should be installed around the perimeter of the landfill and samples analyzed.

Site 8

At a minimum, the free product observed in monitoring well MPT-8-3 must be removed. Additional monitoring of the existing well should be conducted. The lab data sheets for well MPT-8-3 should be checked, endrine aldehyde is recorded below detection limits and heptachlor is recorded as .03 ug/l.

Site 9

The lab data sheets for well MPT-9-1 should be checked, B-BHC not aldrin is recorded at .07 ug/l. The recommendations for Site 9 state that an environmental risk assessment will be done on the site because of elevated levels of total mercury. What about the level of 4,4'-DDE which exceeds the USEPA ambient water quality criteria for chronic exposure in marine environments and the level of naphthalene which exceeds the FDER target level for groundwater cleanup, will they be addressed? How will the level of B-BHC relate to the risk assessment?

Site 13

The proposed work appears adequate. The additional wells should be placed as close to the fire training areas as physically possible.

Site 14

Only two soil samples were taken from the monitoring well borings. Additional soil samples should be taken and analyzed from the area of the spill, the oil-water separator and near the concrete pad. The exact locations of the concrete pad, oil-water separator and drum storage area should be clearly indicated on Figure 3-14. The site description indicated that the oil-water separator malfunctioned and contaminated the soil behind Building 1456. Which direction is "behind" Building 1456? This area should be sampled.

Site 16

The proposed work appears adequate.

Please call me if you have any further questions.

SK:bt

cc: Ashwin Patel